

**From:** [Ken Merrill](#)  
**To:** [Bray, Dave](#)  
**Cc:** [Zach Welcker](#)  
**Subject:** RE: Permit Review for Ponderay Newsprint Company  
**Date:** Wednesday, February 22, 2017 4:15:53 PM  
**Attachments:** [image011.png](#)

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Yes 1:30 tomorrow will work. I will call you.

Thank you again --Ken

Ken Merrill

Water Resources Program

(509) 447-7276 (office)

(b) (6)

KNRD-color



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**From:** Bray, Dave [mailto:Bray.Dave@epa.gov]  
**Sent:** Wednesday, February 22, 2017 12:08 PM  
**To:** Ken Merrill  
**Subject:** RE: Permit Review for Ponderay Newsprint Company

Hi Ken,

Will 1:30 tomorrow afternoon work for you all to have a call on the Ponderay Newsprint debarker/chipper project permit?

I talked with HQ and the EPA contractor this morning and have a much better understanding of what they were trying to convey in their report. With that understanding, Jay and I now have some thoughts about things the Tribe might want to discuss with Ecology.

Let me know if that time works or whether there is a better time tomorrow afternoon.

Dave

**David C. Bray**

Associate Director for Air

Office of Air and Waste

EPA Region 10

Seattle, WA

(206) 553-4253

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**From:** Ken Merrill [<mailto:kmerrill@kalispeltribe.com>]  
**Sent:** Wednesday, February 08, 2017 12:48 PM  
**To:** Bray, Dave <[Bray.Dave@epa.gov](mailto:Bray.Dave@epa.gov)>  
**Subject:** RE: Permit Review for Ponderay Newsprint Company

Hi David,

Within around a week would work best for us so we can be well informed for our meeting with Ecology. I see I just didn't scroll down far enough on the Ecology's Permit web page.

Thanks --Ken

Ken Merrill

Water Resources Program

(509) 447-7276 (office)

(b) (6)

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**From:** Bray, Dave [<mailto:Bray.Dave@epa.gov>]

**Sent:** Wednesday, February 08, 2017 12:35 PM

**To:** Ken Merrill

**Subject:** RE: Permit Review for Ponderay Newsprint Company

Hi Ken,

One thing you didn't say in your original request is when you'd like to get our review of the contractor's report.

I know that you've requested a consultation with Ecology and I assume that you'd like to have our thoughts on the report before that meeting. So just let me know when you'd like them and I'll try meet that date (unless of course, you're meeting with Ecology this week – that would be a challenge).

Dave

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**From:** Ken Merrill [<mailto:kmerrill@kalispeltribe.com>]

**Sent:** Wednesday, February 08, 2017 12:31 PM

**To:** Bray, Dave <[Bray.Dave@epa.gov](mailto:Bray.Dave@epa.gov)>

**Subject:** RE: Permit Review for Ponderay Newsprint Company

Thanks

Ken Merrill

Water Resources Program

(509) 447-7276 (office)

(b) (6)

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**From:** Bray, Dave [<mailto:Bray.Dave@epa.gov>]

**Sent:** Wednesday, February 08, 2017 12:08 PM

**To:** Ken Merrill

**Subject:** RE: Permit Review for Ponderay Newsprint Company

Hi Ken,

I found the links to the NOC application and preliminary determination. They are on the Eastern Regional Office Title V operating permit website. Here's the link:

[http://www.ecy.wa.gov/programs/air/AOP\\_Permits/ERO\\_Permits/ero\\_aop\\_permits.htm](http://www.ecy.wa.gov/programs/air/AOP_Permits/ERO_Permits/ero_aop_permits.htm)

Dave

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**From:** Ken Merrill [<mailto:kmerrill@kalispeltribe.com>]

**Sent:** Wednesday, February 08, 2017 8:51 AM

**To:** Bray, Dave <[Bray.Dave@epa.gov](mailto:Bray.Dave@epa.gov)>

**Subject:** RE: Permit Review for Ponderay Newsprint Company

Hi David,

I can't find any link to an application. I have a call in trying to get the application. I have some additional concern that the PCB-contaminated wastewater sludge is allowed to be incinerated on-site without full analyses of the potential impact. --Ken

Ken Merrill

Water Resources Program

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**From:** Bray, Dave [<mailto:Bray.Dave@epa.gov>]

**Sent:** Tuesday, February 07, 2017 6:04 PM

**To:** Ken Merrill

**Subject:** RE: Permit Review for Ponderay Newsprint Company

Hi Ken,

It looks like there are a couple of issues/questions here that we should look into. I'll get this to both our modeler and our permit engineers to see what they think about the technical issues – emission calculations, major source status, modeling – and I'll do some thinking about options the Tribe might pursue with Ecology to address its concerns.

Do you know if the NOC application is available on Ecology's website? I can get the current Title V permit from their website but often they don't post NOC applications.

Talk to you soon.

Dave

**David C. Bray**

Associate Director for Air

Office of Air and Waste

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Seattle, WA

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**From:** Ken Merrill [<mailto:kmerrill@kalispeltribe.com>]

**Sent:** Tuesday, February 07, 2017 4:44 PM

**To:** Bray, Dave <[Bray.Dave@epa.gov](mailto:Bray.Dave@epa.gov)>

**Subject:** FW: Permit Review for Ponderay Newsprint Company

Hi David,

Attached is a brief review provided by an EPA contractor of the Newsprint pulp mill's air permit located just upwind of the reservation that is being modified by Ecology to add more emissions. Based on the permit review, there seems to be some incorrect basis of the previous permit conditions and classification of the facility as a minor source. We are going to have had a call with Andrew from SCA to discuss their review on Monday. We have also asked for an extension to the comment period and a consultation with Ecology. Could you and your staff please take a look and provide some assistance to the Tribe on what recourse we may have to

better protect our air quality from this source?

Thanks --Ken

Ken Merrill

Water Resources Program

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**From:** Andrew D. Shroads, QEP [<mailto:ashroads@scainc.com>]

**Sent:** Friday, February 03, 2017 9:57 AM

**To:** Ken Merrill

**Cc:** [JPrice@indecon.com](mailto:JPrice@indecon.com); [Colon.Toni@epa.gov](mailto:Colon.Toni@epa.gov); Phil Norwood; Stephen Edgerton

**Subject:** Permit Review for Ponderay Newsprint Company

Please find attached to this email a permit review of the Ponderay Newsprint Company (PNC) Notice of Construction (NOC) application for installation of an electric chipper/debarker. The review included the NOC application, Title V air operating permit, associated support documents, and news releases, to determine the compliance and permit status of the PNC facility. Conclusions and recommendations are included at the end of the permit review.

Please let me know if you have any questions or comments regarding this permit review. If you would like to participate in a conference call to discuss the permit review or any related actions, please let me know, and I will make the appropriate arrangements.

Sincerely,

**Andrew D. Shroads, QEP**

*Senior Air Quality Specialist / Regional Manager*



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